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**From:** MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]  
**Sent:** 9/2/2021 5:25:19 PM  
**To:** Ma, Grace [Ma.Grace@epa.gov]  
**Subject:** RE: Area 40 RDIP construction completion report

Grace – Thanks for reaching out. I reviewed the Phase 2 Construction Completion report an submitted a couple of comments on 4/19/2021. Those questions were:

Appendix A cuts off each of the figures on both sides, so what is provided is not the complete figure. Not an issue with the rest of the appendices.

In some of the daily reports there a figures showing a cross section down the trench showing the bottom of the trench, design top of wall, as-built completion, original ground surface. . . . It would have been good to be provided with a single figure that compiles all of the information and shows the as-built construction of the wall in cross-section.

Aerojet provided the replacement figures for Appendix A and a cross-section that would be placed in the final version of the document.

I believe that Aerojet's response actions met the criteria in the RAP. Aerojet is conducting groundwater, soil vapor and ambient air monitoring as required. The air monitoring will be used to determine if the second phase of remediation – operating an in-situ remediation system at the 36B and 37B source areas is needed to further reduce the volatiles entering ambient air – is necessary. They have conducted three rounds of sampling so far – we have not seen the results of the third round.

I don't see a need for additional sampling, other than the monitoring that they are doing. If you look at the requirements for removal of perchlorate, there were some objectives that had a modifying criteria based on volumes of soils that would be removed. Once those volumes were met – I think Aerojet even went beyond them – then the residual perchlorate would be left even if it exceeded the remedial action numerical criteria. That criteria was based on protection of water quality. It was known going in that is was highly unlikely that they would meet that value everywhere.

I have no additional comments on the report and would approve it. I do not believe we will be doing that as it is a DTSC-issued RAP and it does not require us to approve the document.

Hope that addresses your questions. If not, please contact me again for clarification. I can usually be reached by phone at 916-464-4625 from 7-12 and from 1-4 at 916-858-1030 (home).

Alex

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**From:** Ma, Grace <Ma.Grace@epa.gov>  
**Sent:** Wednesday, September 1, 2021 2:59 PM  
**To:** MacDonald, Alex@Waterboards <Alex.MacDonald@waterboards.ca.gov>  
**Subject:** Area 40 RDIP construction completion report

EXTERNAL:

Dear Alex,

I started leaving a voice mail on your work number, but an automated message asked for my subscriber number.

I'm the new EPA remedial project manager for Aerojet. I'm taking over Chuck Swanson's roles and responsibilities for Area 40, vapor intrusion and other issues that Daewon Rojas-Mickelson doesn't manage.

Are you reviewing the Area 40 Remedial Design and Implementation Plan Phase 2 Construction Completion Report? Do you think that Aerojet's cleanup activities meet DTSC's remedial cleanup goals and criteria? Do you think any additional sampling or work is required?

I asked Peter MacNicholl the same questions. He didn't have any concerns, but he didn't respond to my question about additional sampling or additional work.

I have two comments on the report that I'll send to everyone. I discussed the report with EPA's new contractor EA. Aerojet left some perchlorate contamination in place above the Remedial Design and Implementation Plan goals but below residential criteria. Also, there is a discrepancy for the key in thickness at one station in the construction contractor's permeable reactive barrier report in Appendix B.

I told Pete that EPA will use the Area 40 Remedial Design and Implementation Plan Phase 2 Construction Completion Report as the basis and data set for our Record of Decision (ROD). We need to be confident that the completed work meets DTSC's cleanup requirements. If we can't verify that the cleanup was done correctly and completely, then EPA would have to sample and certify. That would add more time and effort. If EPA does additional cleanup, then we're no longer writing a no action ROD.

EPA would not approve this report since Aerojet performed DTSC approved remedial work under DTSC oversight. My understanding is that DTSC would approve this report, but please let me know if you're involved in the approval process.

Thank you,  
Grace

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